

January 20, 2016

Subject: U.S. Comments on Proposed for the Codex Crop group 020 Cereal grains, Legume Vegetable and Cucurbits Fruiting Vegetables

To: Chair of the Electronic Working Group

From: U.S. Delegation

The U.S. Delegation would like to thank the Chair of the EWG for all your work on this important effort on behalf of growers. The U.S. delegation has reviewed the proposed compromises put forth by the Chair of the EWG and offers the following comments.

Group 014. Legume Vegetables – Proposed Compromise:

- 14A. Beans with pods
- 14B. Peas with pods
- 14C. Succulent beans without pods
- 14D. Succulent peas without pods
- 14E. Underground beans and peas

As noted in the write-up circulated by the EWG, the United States does not propose to include underground beans and peas in its revised Legume Vegetable Group for beans and peas since edible parts develop underground with no direct exposure to pesticide applications. However, the U.S. can support the separate subgroup – Underground beans and peas proposed for inclusion in the Codex crop grouping scheme.

Group 015. Pulses – Proposed Compromise:

- 15A. Dry Beans
- 15B. Dry Peas
- 15C. Dry Underground Legumes

As noted in the write-up circulated by the EWG, the United States does not propose to include dry underground legumes in its revised Legume Vegetable Group for beans and peas since edible parts develop underground with no direct exposure to pesticide applications. However, the U.S. can support the separate subgroup – Underground dry legumes proposed for inclusion in the Codex crop grouping scheme.

Group 012. Fruiting Vegetables, Cucurbits – Proposed Compromise:

- 11A. Cucumber and Summer Squash
- 11B. Melons

The United States would prefer the Fruiting Vegetable, Cucurbits Group be divided into a 11A. Melon subgroup and 11B. Squash/Cucumber subgroup. However, there appears to be little support for this option. Therefore, United States can support the option with two subgroups including 11A. Cucumber and Summer Squashes (also known as Cucurbits

with edible peel) and 11B. Melons and Pumpkins (also known as Cucurbits with inedible peel).

The United States is opposed to any option that would require the need for additional data on another representative crop. The United States does not believe requiring additional residue field trial data for winter squash is necessary and that having these additional data will be informative. The main purpose of this crop grouping effort is to allow for the use of crop groups to establish tolerances for multiple commodities, especially minor and specialty crops, based on data from representative commodities. This will provide growers with a greater number of necessary pest control tools for food production. Registrants are unlikely to spend the funds needed to conduct the necessary studies.

Group 020. Cereal Grains – Proposed Compromise:

Subgroup 20A. Wheat (would include pseudocereals) (wheat as rep commodity)
Subgroup 20B. Barley (barley as representative commodity)
Subgroup 20C. Rice (rice as representative commodity)
Subgroup 20D. Maize, Grain Sorghum and Millet (Maize and sorghum or millet as rep)
Subgroup 20E. Sweet Corn (sweet corn as representative commodity)

At this time the United States does not support this proposed compromise and supports the creation of a single small grains subgroup. The United States agrees that this is a preferred proposal since there is no separate subgroup for the pseudocereal grains. However, the United States believes there is little value in separating the Small grains into a Wheat 20A subgroup and a Barley 20B subgroup. The United States does not see the value in having two separate subgroups where the crops are similar and the main difference between these groups is wheat and barley. The United States has agreed that there may be value to have both wheat and barley as representative commodities for the subgroup but still supports the creation of a single small grains subgroup. However, the United States will have additional internal discussions in preparation of the upcoming CCPR meeting and will consider the comments from the other members.